

EXHIBIT C

Ryan Forgione

From: Barry Rothschild
Sent: Monday, July 25, 2022 12:54 PM
To: Ryan Forgione
Subject: Fwd: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

Sent from my iPhone

Begin forwarded message:

From: Paul Muniz <pmuniz@donovanhatem.com>
Date: July 25, 2022 at 9:20:31 AM EDT
To: David Wilson <dew@corwinlaw.com>, Ken Newberg <knewberg@corwinlaw.com>
Cc: Barry Rothschild <brothschild@donovanhatem.com>, Tom Duquette <tdduquette@gmail.com>
Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

David, Have you forwarded the link to us yet? The parties jointly agreed in their last submission to the court to file any motions to compel third party productions today. Thanks. Paul

Paul Muniz, Esq.

Partner

Donovan Hatem LLP

53 State Street | 8th Floor | Boston, MA | 02109

Tel (617) 406-4610 / Mobile (978) 729-5052 / Fax (617) 406-4501

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From: David Wilson <dew@corwinlaw.com>
Sent: Wednesday, July 20, 2022 3:43 PM
To: Paul Muniz <pmuniz@donovanhatem.com>; Ken Newberg <knewberg@corwinlaw.com>
Cc: Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>
Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

Hello Paul. I now have a link to what SeaDar compiled based on your search terms and the time frame. I just need to look at it and see if they appear to have done it correctly. I should be able to send the link to you tomorrow.

David E. Wilson, Esquire
Corwin & Corwin LLP
600 Unicorn Park Drive
Woburn, MA 01801
Tel: 617-742-3420
Direct: 617-849-6058
Fax: 617-742-2331
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From: Paul Muniz <pmuniz@donovanhatem.com>
Sent: Wednesday, July 20, 2022 1:57 PM
To: David Wilson <dew@corwinlaw.com>; Ken Newberg <knewberg@corwinlaw.com>
Cc: Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>
Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

David, Please advise if you are available for a meet and confer tomorrow afternoon or Friday pursuant to LR 7.1. Thank you.

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From: Paul Muniz
Sent: Tuesday, July 12, 2022 3:47 PM
To: David Wilson <dew@corwinlaw.com>; Ken Newberg <knewberg@corwinlaw.com>

Cc: Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>
Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

David, Please confirm there is a firm date for this production or in the alternative times you are available for a meet and confer. Thank you. Paul

From: Paul Muniz
Sent: Thursday, July 7, 2022 12:38 PM
To: David Wilson <dew@corwinlaw.com>; Ken Newberg <knewberg@corwinlaw.com>
Cc: Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>
Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

David, Can you provide a firm date for production at this juncture? Thank you. Paul

From: David Wilson <dew@corwinlaw.com>
Sent: Wednesday, June 29, 2022 5:39 PM
To: Paul Muniz <pmuniz@donovanhatem.com>; Ken Newberg <knewberg@corwinlaw.com>
Cc: Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>
Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

Hello Paul. SeaDar is working on it and should be completed soon. I'll let you know asap. Thanks.
David

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Woburn, MA 01801
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From: Paul Muniz <pmuniz@donovanhatem.com>
Sent: Wednesday, June 29, 2022 10:35 AM
To: Ken Newberg <knewberg@corwinlaw.com>; David Wilson <dew@corwinlaw.com>
Cc: Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>
Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

I am following up on my emails below. Please advise as to when we can anticipate receiving your clients responsive documents. Thank you.

Paul Muniz, Esq.

Partner

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From: Paul Muniz

Sent: Tuesday, June 21, 2022 12:56 PM

To: Ken Newberg <knewberg@corwinlaw.com>; David Wilson <dew@corwinlaw.com>

Cc: Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>

Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

David, Please let me know when you anticipate your client will be in a position to produce the responsive materials. Thank you. Paul

From: Paul Muniz

Sent: Thursday, June 16, 2022 11:06 AM

To: Ken Newberg <knewberg@corwinlaw.com>; David Wilson <dew@corwinlaw.com>

Cc: Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>

Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

David, Following up on most recent conversation, please find below our proposed search terms:

1. To/from/cc/bcc the following email addresses:

- a. jberylson@me.com
- b. jberylson@gccinv.com
- c. jberylson@gmail.com
- d. aberylson@aol.com
- e. bob@silicapond.com
- f. silicapond@outlook.com
- g. rich@truestconstruction.com

- h. igrippo@goulstonstorrs.com
 - i. rosenberg@silman.com
 - j. oppenheimer@silman.com
 - k. zimmer@frener-reifer.com
2. Correspondence to/from/cc/bcc the following people (including emails other than those above):
- a. John Berylson
 - b. Amy Berylson
 - c. Robert (Bob) Carlson
 - d. Rich (Richie) Roberts
 - e. Jon Grippo
 - f. Ben Rosenberg
 - g. Nate Oppenheimer
 - h. Elizabeth Berylson Katz
 - i. Debora Smith Knez
 - j. Gale Associates
 - k. Frener-Reifer

Should you have any questions, please let me know.

Paul Muniz, Esq.

Partner

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From: Paul Muniz

Sent: Tuesday, June 14, 2022 2:52 PM

To: Ken Newberg <knewberg@corwinlaw.com>

Cc: David Wilson <dew@corwinlaw.com>; Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>

Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

Ken and David, Bumping this up to the top of your inbox. Unfortunately, the Court has put us in a position where we will need to engage in motion practice shortly if we cannot reach an agreement. Paul

Paul Muniz, Esq.

Partner

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From: Paul Muniz

Sent: Tuesday, June 7, 2022 3:00 PM

To: Ken Newberg <knewberg@corwinlaw.com>

Cc: David Wilson <dew@corwinlaw.com>; Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>

Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

Ken and David,

We are willing to narrow the focus of the subpoena to documents dated prior to June 30, 2018. We are principally looking for correspondence (emails, texts, letters) regarding the Project and Project award. Since we likely have any correspondence between Sea-Dar and the architect, we are looking for correspondence between Sea-Dar and others, including but not limited to subcontractors, the Owners, owners' project representative and the owners' counsel. We are also looking for all agreements/contracts, including drafts related to the Project and schedules. Thank you.

Paul Muniz, Esq.

Partner

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From: Ken Newberg <knewberg@corwinlaw.com>
Sent: Tuesday, June 7, 2022 12:41 PM
To: Paul Muniz <pmuniz@donovanhatem.com>
Cc: David Wilson <dew@corwinlaw.com>; Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>
Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

Hi Paul,

I seem to be out of the loop on this one.

The last I recall, you served the subpoena, Sea-Dar objected, and we discussed an openness of having Sea-Dar make a more limited production but nothing happened after that. David Wilson is the relationship partner but is on vacation this week. Once he gets back, we'll have a better grasp on where things stand.

Thank you,

Ken

Kenneth A. Newberg, Esq.
CORWIN & CORWIN LLP

From: Paul Muniz <pmuniz@donovanhatem.com>
Sent: Tuesday, June 7, 2022 10:45 AM
To: Ken Newberg <knewberg@corwinlaw.com>
Cc: David Wilson <dew@corwinlaw.com>; Barry Rothschild <brothschild@donovanhatem.com>; Tom Duquette <tdduquette@gmail.com>
Subject: RE: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

Ken, I am following up on my voicemail regarding Sea-Dar Enterprises, Inc.'s Response and Objections to our clients' KOR Subpoena. I would like to schedule a meet and confer at your earliest convenience. Thank you. Paul

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From: Ken Newberg <knewberg@corwinlaw.com>

Sent: Tuesday, February 8, 2022 4:45 PM

To: Paul Muniz <pmuniz@donovanhatem.com>; Barry Rothschild <brothschild@donovanhatem.com>; Christopher Redd <credd@donovanhatem.com>; Thomas D. Duquette <tduquette@donovanhatem.com>; wsrogers@princelobel.com; cmiller@princelobel.com; mmadden@princelobel.com; lkoslowsky@princelobel.com

Cc: David Wilson <dew@corwinlaw.com>

Subject: Berylson & Berylson v. 1100 Architect and Piscuskas: Sea-Dar Enterprises, Inc.'s Response and Objections to Deposition Subpoena

Dear Counsel,

Please see Sea-Dar Enterprises, Inc.'s attached Response and Objections to Deposition Subpoena and the Declaration of John Kruse in Support.

Sincerely,

Kenneth A. Newberg, Esq.
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Woburn, MA 01801
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